Bart (6SF-RA)

EPA

United States
Environmental Protection Agency
Region VI
Allied Bank Tower at Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Official Business
Penalty For Private Use
$300

Texas Natural Resource Conservation
Commission (TNRCC)
Pollution Cleanup Division
Attn: Mr. Alan Seils (NC-142)
P. O. Box 13087
Austin, TX
78711-3087

EPA Form 1320-3 (Rev. 3-84)

BOOKMARK

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
HOUSTON BRANCH
10625 FALLSTONE ROAD
HOUSTON, TEXAS 77099

RESUBMITTED DATA REVIEW REPORT

DATE: May 16, 1996 CASE #: 24501

SAS #:

TO: B. Canellas (6SF-RA) SDG #: FEM97

LAB : AATS

FROM: Chris Covington - ESAT SITE : OLD BRAZOS FORGE

Region 6 PAGE: 1 of 1

ESAT#: O-1684 TDF#: 6-6233A

EFFECTS OF RESUBMITTED INFORMATION ON THE ORIGINAL DATA:

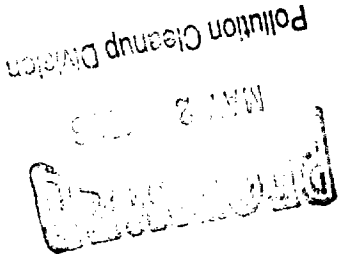
Laboratory response to Region 6 request (received 5/13/96):

Pest/PCB

1. The reviewer does not agree with the laboratory's interpretation of the SOW concerning the required Form 6 (I and J) for calibration verifications. This issue does not affect data usability.

2. The laboratory submitted a rescaled chromatogram to demonstrate the acceptable resolution between endosulfan I and α-chlordane. Please insert page 326A into the data package as additional data. The original data assessment is unaffected.

3. The laboratory correctly reported three different quantitation peaks for AR1221 in the resubmission. Please replace pages 305, 375, and 376 and insert page 358A into the original data package.



RESPONSE TO REGION REQUEST

DATE: May 9, 1996

TO: Chris Covington -- ESAT

FROM: Brett Dees -- Southwest Laboratory of Oklahoma, Inc.

RE: Case 24501, SDG: FEM97

Pest/PCB:

1) By contract, form 6Is for continuing INDAs and INDBs are not required. The question as to whether form 6Is are required for continuing INDAs and INDBs was raised on April 7, 1995 to the EPA. The clarification was as follows: resolution forms are required for all initial calibration and continuing calibration PEMs, but resolution forms for the INDAs and INDBs are only required for the initial calibration. A copy of the EPA's Record of Communication and SWLO's telephone log concerning this conversation has been enclosed. It should be noted that an error was found in the EPA's Communication record. It states that "the lab only needs to submit those forms [6s] for the PEM, INDA, and INDB in the initial calibration." This should also include the report of continuing PEMs.

2) Although this is not understood to be a contractual requirement, a rescaled chromatogram has been submitted.

3) The single-point Aroclor peak integrations are only highly scrutinized when Aroclors are found in a sample, hence the 3rd peak omission. Corrections have been made and submitted.

RESPONSE TO REGION REQUEST

DATE: May 9, 1996

TO: Chris Covington -- ESAT

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RE: Case 24501, SDG: FEM97

Pest/PCB:

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3) The single-point Aroclor peak integrations are only highly scrutinized when Aroclors are found in a sample, hence the 3rd peak omission. Corrections have been made and submitted.

T E L E P H O N E L O G

DATE: April 7, 1995

TO: NAZY ABUSSADI/DOUG HODUM, DYNACORP.

FROM: BRETT DEES

RE: QUESTIONS CONCERNING RESOLUTION FORM REQUIREMENTS.

On April 7. 1995, I called Nazy Abussadi of Dyncorp to ask if form 6s, resolution reports, for continuing calibration INDAM/INDBM are required by contract. I talked with her and she said she would call me back with an anwser. At opproximately 1:45pm, Doug Hodum and a chemist (name unknown) called back to help with my question. We referred to D-32/PEST upon my request. 9.3.5.2 states, "All single component pesticides and surrogates in the PEMs used to demonstrate continuing calibration must be greater than or equal to 90.0 percent resolved. The resolution between any two adjacent peaks in the midpoint concentrations of Individual Standard Mixtures A and B in the *initial calibration* must be greater than or equal to 90.0 percent." It talks about continuing PEMs, but only about initial INDA/Bs. This seemed odd because it is in the Tehcnical Acceptance Criteria for Calibration Verification Section. We also referred to B-52 of OLM03.1, paragraph 13.12.4.4. It states that "Form VI (PEST-5, PEST-6 and PEST-7 for *each* pair of PEM, mid-level initial calibration mixture A, and mid-level *initial* calibration mixture B, respectivley) shall be used to report the percent resolution between each pair of analytes according to the definition in Exhibit D (pesticides)." Upon review of both of these sections, we all agreed that we must report resolution forms for <u>all</u> initial calibration <u>and</u> continuing calibration PEM, but only report resolution forms for the <u>initial</u> calibration INDAM/INDBM.

CONTRACT LABORATORY ANALYTICAL SERVICES SUPPORT (CLASS)
RECORD OF COMMUNICATION

Name: Doug Nadeau

Contact Recv'd Via: ☐ Phone ☐ Fax ☐ VMail ☐ Memo ☒ Other REFERRAL FROM NAZ-A

Date/Time of Contact: 7 APRIL 1995 PM

Initiated By: ☒ Lab ☐ CLASS ☐ Region ☐ Other _____

Contact Name/Org./Phone #: BRETT BEEZ SWOK

Lab SWOK Contract # DS-00021 DS-00026 Case # _____ SDG _____ Region VI

SOW: OLM03.1 Affected Samples: _____ Invoice # _____

Discussion/Issue: THE LAB WANTED TO KNOW IF THEY HAD TO SUBMIT FORMS 6H, 6I AND 6J FOR THE PEM, INDA, AND INDAB IN THE CONTINUING CALIBRATION.

Resolution: THE LAB ONLY NEEDS TO SUBMIT THOSE FORMS FOR THE PEM, INDA, AND INDAB IN THE INITIAL CALIBRATION.

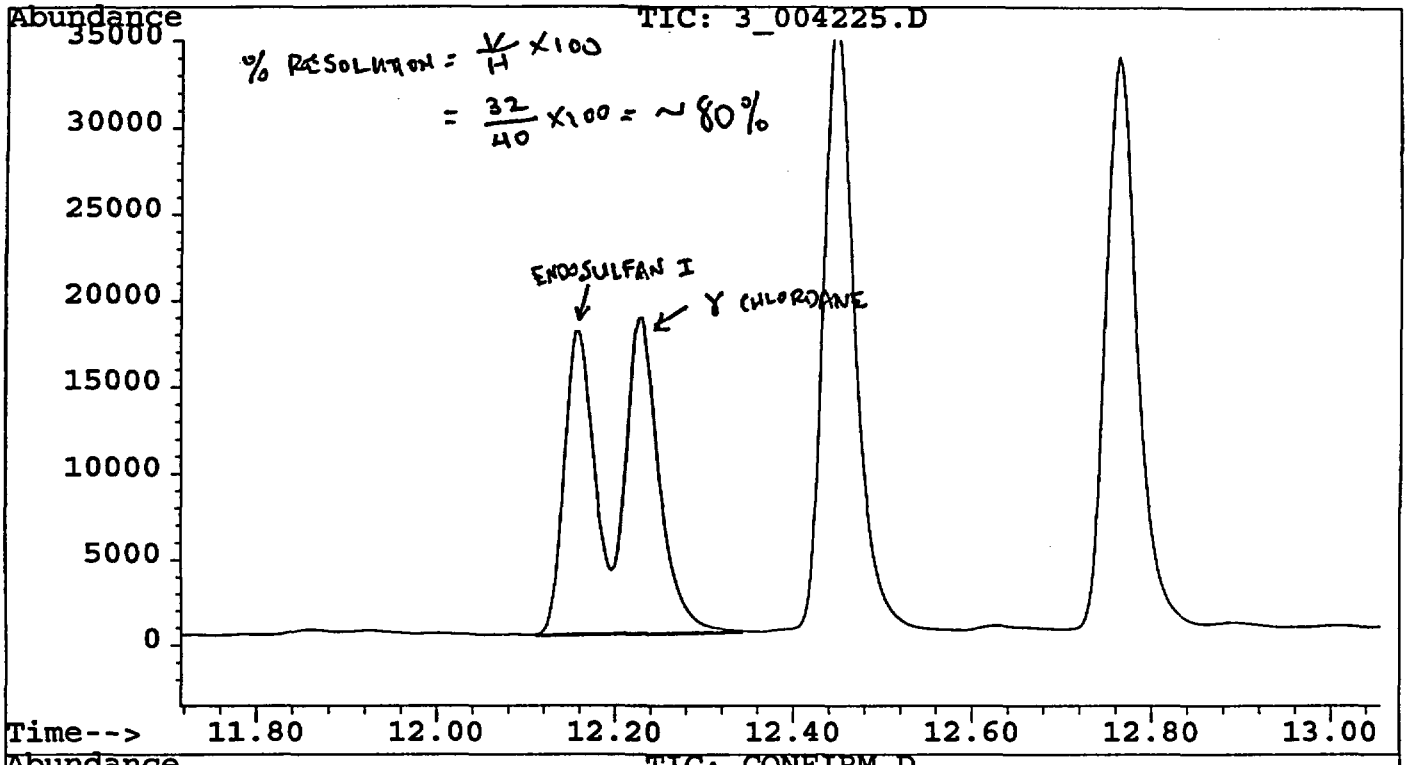
RAS OPS Routed ☐ Yes ☐ No Completed Date/Time _____

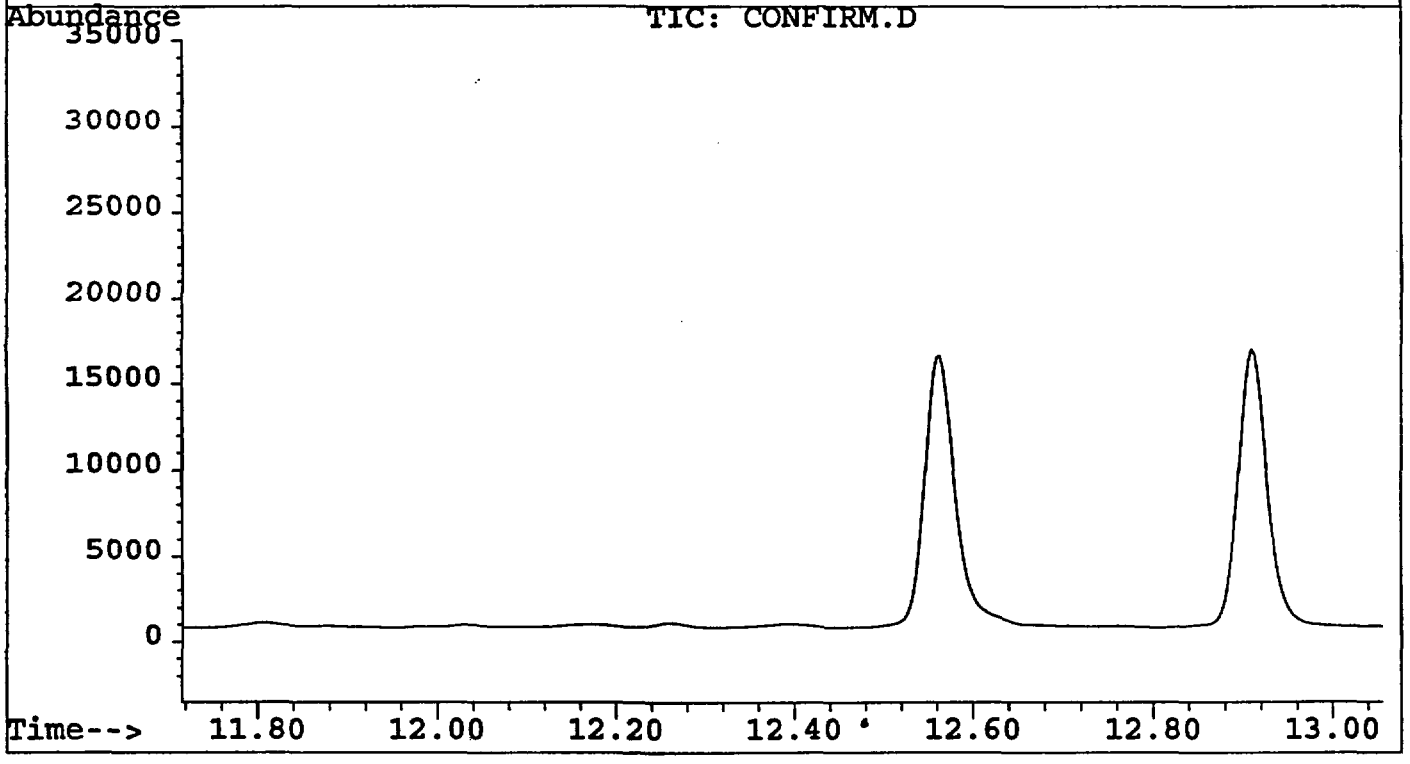
Referred To _____ Date/Time _____ W.A. # _____

Distribution: (1) Lab, (2) Region, (3) CLASS (4) AOB

File : F:\TMP\HPCHEM\HP\3\DATA\03_25_96\3_004225.D
Operator : HM
Acquired : 25 Mar 96 11:51 PM using AcqMethod OLM03.MTH
Instrument : HP_03
Sample Name: RESC3D
Misc Info : 5-311-14
Vial Number: 6

~ 40 mm : PEAK HEIGHT
~ 32 mm : VALLEY DEPTH





6F

PESTICIDE INITIAL CALIBRATION OF MULTICOMPONENT ANALYTES

ab Name: SWL-TULSA Contract: 68-D5-0022

Lab Code: AATS Case No.: 24501 SAS No.: SDG No.: FEM97

Instrument ID: HP_03A Date(s) Analyzed: 03/26/96 03/26/96

GC Column: DB-1701 ID: 0.32(mm)

COMPOUND	AMOUNT (ng)	PEAK	RT	RT WINDOW FROM	RT WINDOW TO	CALIBRATION FACTOR
Toxaphene	0.50	*1	14.40	14.33	14.47	630770
		*2	14.59	14.52	14.66	863020
		*3	15.02	14.95	15.09	1151702
		4	15.13	15.06	15.20	577498
		5				
Aroclor 1016	0.10	*1	8.31	8.24	8.38	1281880
		*2	9.04	8.97	9.11	3117990
		*3	9.83	9.76	9.90	5850870
		4	10.08	10.01	10.15	2511940
		5	10.46	10.39	10.53	3815970
Aroclor 1221	0.20	*1	7.91	7.84	7.98	673665
		*2	8.38 ~~8.31~~	8.31 ~~8.24~~	8.45 ~~8.38~~	~~1793450~~ 4 37,85
		*3	8.31	8.24	8.38	1793450
		4				
		5				
Aroclor 1232	0.10	*1	8.31	8.24	8.38	1366700
		*2	9.04	8.97	9.11	1383640
		*3	9.83	9.76	9.90	2461280
		4	10.08	10.01	10.15	1151860
		5				
Aroclor 1242	0.10	*1	9.04	8.97	9.11	2146430
		*2	9.83	9.76	9.90	4495260
		*3	10.08	10.01	10.15	2009120
		4	10.47	10.40	10.54	2097170
		5	10.88	10.81	10.95	2292740
Aroclor 1248	0.10	*1	9.83	9.76	9.90	2132410
		*2	10.46	10.39	10.53	2292650
		*3	10.88	10.81	10.95	2362520
		4	11.05	10.98	11.12	1678380
		5	11.57	11.50	11.64	2581500
Aroclor 1254	0.10	*1	11.57	11.50	11.64	4130430
		*2	11.92	11.85	11.99	1614810
		*3	12.72	12.65	12.79	125750
		4	13.01	12.94	13.08	2881120
		5	13.82	13.75	13.89	3393940
Aroclor 1260	0.10	*1	12.90	12.83	12.97	2906340
		*2	13.25	13.18	13.32	3648180
		*3	13.93	13.86	14.00	2241840
		4	14.86	14.79	14.93	5262910
		5	15.46	15.39	15.53	3875480

* Denotes required peaks

4 corrections By 5/1/96

Quantitation Report

Signal #1 : F:\TMP\HPCHEM\HP\3\DATA\03_25_96\3_004228.D Vial: 9
Signal #2 : F:\TMP\HPCHEM\HP\3\DATA\03_25_96\3_004228.D\CONFIRM.D
Acq On : 26 Mar 96 01:23 Operator: HM
Sample : AR12213D Inst : HP_03
Misc : 5-349-14 Multiplr: 0.0010
Quant Time: May 9 11:13 1996

Method : F:\HPCHEM\HP\3\METHODS\80PCBE2.M
Title : PCB/TOXAPHENE
Last Update : Fri May 03 13:51:05 1996
Response via : Single Level Calibration

Volume Inj. : 2uL
Signal #1 Phase : DB-1701 Signal #2 Phase: DB-17
Signal #1 Info : 0.32mm Signal #2 Info : 0.32mm
Signal #1 Inst : HP_03A Signal #2 Inst : HP_03B

	Compound	RT#1	RT#2	Resp#1	Resp#2	ngonCol	ngonCol
	Surrogate Compounds						
1)	L8 TCX	7.26	7.84	1014085	700459	0.0210	0.0187
				Recovery	=	105.00%	93.50%
38)	L9 DCB	17.72	20.22	952835	819487	0.0188	0.0190
				Recovery	=	94.00%	95.00%
	Target Compounds						
	Total Aroclor-1016			0	0	N.D.	N.D.
)	L2 Aroclor-1221	7.91f	8.73	134733	104730	0.1704	0.1888
8)	L2 Aroclor-1221 {2}	8.20f	9.04	87570	71043	0.1985m	0.1852
9)	L2 Aroclor-1221 {3}	8.31f	9.16	358690	222704	0.2232	0.1913
	Total Aroclor-1221			580994	398477	0.5921	0.5654
	Total Aroclor-1232			0	0	N.D.	N.D.
	Total Aroclor-1242			0	0	N.D.	N.D.
	Total Aroclor-1248			0	0	N.D.	N.D.
	Total Aroclor-1254			0	0	N.D.	N.D.
	Total Aroclor-1260			0	0	N.D.	N.D.
	Total Toxaphene			0	0	N.D.	N.D.

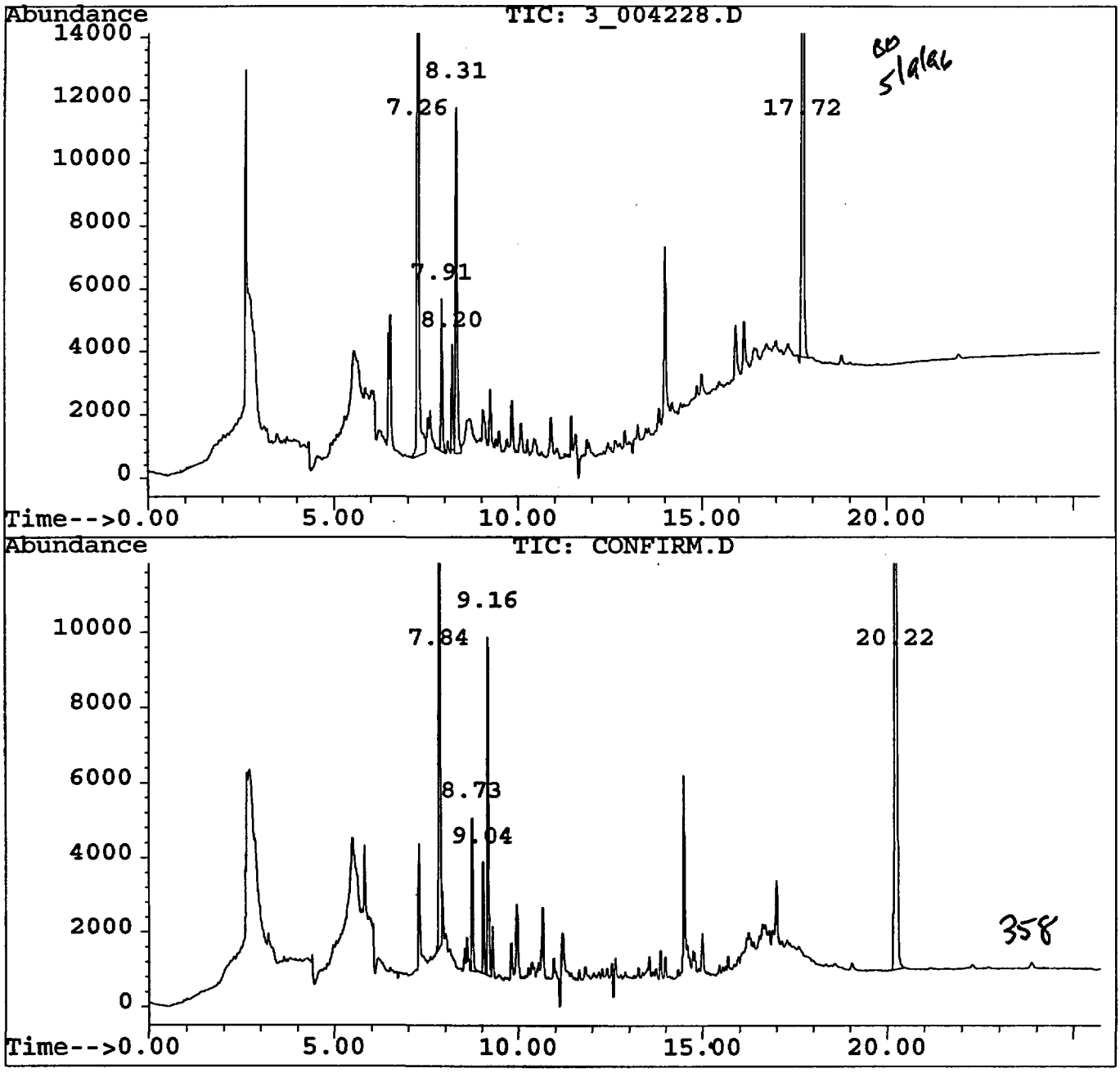
(f)=RT Delta > 1/2 Window (#)=Amounts differ by > 25% (m)=manual int.

Quantitation Report

Signal #1 : F:\TMP\HPCHEM\HP\3\DATA\03_25_96\3_004228.D Vial: 9
Signal #2 : F:\TMP\HPCHEM\HP\3\DATA\03_25_96\3_004228.D\CONFIRM.D
Acq On : 26 Mar 96 01:23 Operator: HM
Sample : AR12213D Inst : HP_03
Misc : 5-349-14 Multiplr: 0.0010
Quant Time: May 9 11:13 1996

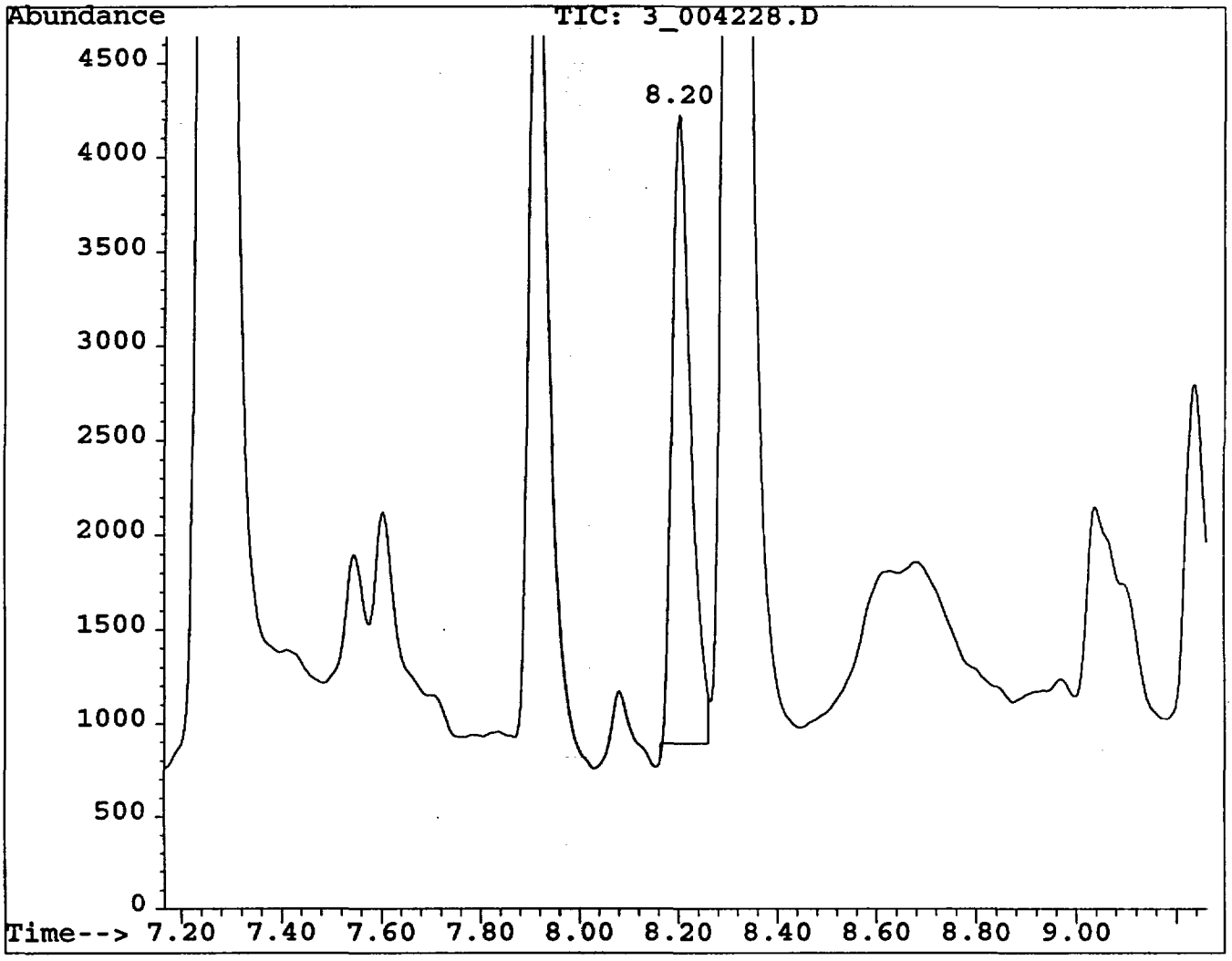
Method : F:\HPCHEM\HP\3\METHODS\80PCBE2.M
Title : PCB/TOXAPHENE
Last Update : Fri May 03 13:51:05 1996
Response via : Single Level Calibration

Volume Inj. : 2uL
Signal #1 Phase : DB-1701 Signal #2 Phase: DB-17
Signal #1 Info : 0.32mm Signal #2 Info : 0.32mm
Signal #1 Inst : HP_03A Signal #2 Inst : HP_03B



MANUAL INTEGRATION REPORT

Data File: F:\TMP\HPCHEM\HP\3\DATA\03_25_96\3_004228.D
Date Acquired: 26 Mar 96 01:23
Inst: HP_03 Operator ID: HM
Name: AR12213D
Misc: 5-349-14
Method: F:\HPCHEM\HP\3\METHODS\80PCBE2.M
Title: PCB/TOXAPHENE
Quant Time: May 9 11:13 1996



Aroclor-1221 {2} 8.20min area: 87570 m

Integration Time Range: 8.17 - 8.26

358A

F:\TMP\HPCHEM\HP\3\DATA\03_25_96\3_004228.D BD
Report generated: Thu May 09 11:15:16 1996

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
EPA HOUSTON LABORATORY
10625 FALLSTONE ROAD
HOUSTON, TX 77099

RESUBMITTED DATA REVIEW REPORT

DATE: May 16, 1996

CASE #: 24501

SDG #: MFGD95

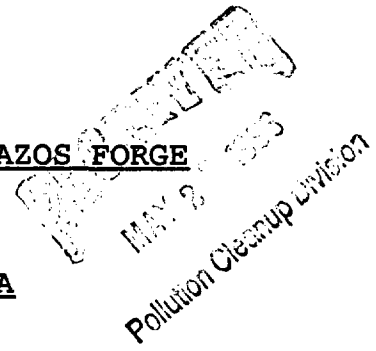
TO: B. Canellas SF-RA
USEPA Region 6

SITE NAME: OLD BRAZOS FORGE

LAB NAME: INCHVT

FROM: Linda Hoffman
ESAT - Region 6

REF: TDF # 6-6231A
I1965



EFFECTS OF RESUBMITTED INFORMATION ON THE ORIGINAL DATA:

Response to CCS (Received 05-14-96)

The resubmitted information does not affect the data review. The laboratory resubmitted the necessary explanations, and these pages should be added to the data package.

REG6

COVER SHEET

LABORATORY RESPONSE TO RESULTS OF CONTRACT COMPLIANCE SCREENING (CCS)

Response To: (Check One) _____ Organic CCS

✓ Inorganic CCS

Response materials should be sent to the attention of the CCS Coordinator.

Labcode: INCHVT

Response Date: 5/13/96

Date Screening Results Received at Laboratory: 4/29/96

EPA Contract No. 68-D5-0063

Case No. 24501

SDG No. MFGD95

Sample Nos.*

MFGD95	
MFGD96	

*Only list sample numbers that require reconciliation.

This form is used to identify materials sent in response to results of Contract Compliance Screening (CCS). A separate form must accompany the response for each SDG.

Please indicate (on the attached continuation form) which fractions and/or which criteria correspond with your resubmission. Response materials sent to CCS should also be copied to the Region with this blue Cover Sheet.

Laboratory Response to Results of CCS

Criterion	Comments
AA38	The laboratory confirms that the samples labeled MFGD95 and MFGD96 were analyzed 1 day out of the specified holding time for mercury analysis. As an oversight, this statement was not included in the narrative.
AQ04	The mercury instrument was calibrated in accordance with the manufacturers specifications. An autozero, labelled "AZ," was necessary at the beginning of the calibration. After this autozero, the calibration was performed in accordance with the USEPA SOW. Note that "A0" begins the calibration.
MD1	Please note ~~that~~ the explaination in the narrative about the time differences between the Raw data and the Form 14 for Hg and CN. The laboratory is still unclear about how to correct this issue. Please refer to the attached copy of page 1. aw 5/13/96

Inchcape Testing Services
Environmental Laboratories

55 South Park Drive
Colchester, VT 05446
Tel. 802-655-1203
Fax 802-655-1248

April 19, 1996

Mr. Jonathan Rude
U.S. Environmental Protection Agency
Contract Laboratory Program (CLP)
Sample Management Office (SMO)
300 N. Lee Street
Alexandria, VA 22314

Re: SDG Narrative
Contract No. 68-D5-0063
Laboratory Project No. 95219
Case No. 24501; SDG No. MFGD95

Dear Mr. Rude:

Enclosed are the analytical results for Case No. 24501; SDG No. MFGD95. The samples were received intact by Inchcape Testing Services Environmental Laboratories on March 21, 1996. Laboratory numbers and quality control samples were assigned and are designated as follows:

EPA Sample ID	Laboratory Number	Sample Matrix
Samples Received on March 21, 1996 ETR No. 57406		
MFGD95	294877	Liquid
MFGD95MS	294877MS	Liquid
MFGD95REP	294877DP	Liquid
MFGD96	294878	Liquid

The laboratory employs the use of a file server/processor to log the data acquisitions and process the data. The time maintained by the system is recognized as the official clock. The time record that is maintained along the left hand margin of the ICP data represents the official time and this is recorded by the data processor on the Form 14. For mercury and cyanide analyses, the official time is not recorded by the raw data, but is recorded by the data processor on the Form 14. The times that appear on the raw data are not official. The difference reflects the inability to precisely synchronize the clocks in different computing environments.

For the benefit of interested parties, documentation of sample handling and preparation is included at the end of the "Sample Data Package". A colored sheet of paper entitled "Sample Preparation Package" has been used to explicitly mark the location of these documents.

U.S.E.P.A. CONTRACT LABORATORY PROGRAM
CONTRACT LABORATORY ANALYTICAL SERVICES SUPPORT - OPERATED BY DYNCORP
INORGANIC CONTRACT COMPLIANCE SCREENING SYSTEM

CCS SCREENING RESULT OF HARDCOPY

S C R E E N I N G P A C K A G E
S U M M A R Y I N F O R M A T I O N

ILM04.0 VER 1.0

SDG: MFGD95

CASE: 24501

LAB: INCHVT

CONTRACT: 68-D5-0063

REGION: 6

DRD: 04/23/96

MAIL DATE 1: 04/26/96

CONTRACT LABORATORY ANALYTICAL SERVICES SUPPORT- OPERATED BY DYNCORP
INORGANIC CONTRACT COMPLIANCE SCREENING SYSTEM
TECHNICAL DEFECT FREQUENCY REPORT
CCS SCREENING RESULT OF HARDCOPY

THIS REPORT PROVIDES A STATISTICAL SUMMARY OF THE TECHNICAL DEFECTS PRESENT IN THIS SDG.

LAB: INCHVT SDG: MFGD95

CRITERIA	DEFECT MESSAGE	NUMBER OF DEFECTS	PERCENT OF TOTAL DEFECTS
AA38	Holding time exceeded. (D-4)	2	10.00
AQ04	Run does not start with a calibration standard. (E-15)	2	10.00
MD1	Compliance cannot be determined, raw data not present. (B-9/B-11)	16	80.00
TOTAL		20	100.00

U.S.E.P.A. CONTRACT LABORATORY PROGRAM
CONTRACT LABORATORY ANALYTICAL SERVICES SUPPORT - OPERATED BY DYNCORP
INORGANIC CONTRACT COMPLIANCE SCREENING SYSTEM

CCS SCREENING RESULT OF HARDCOPY

TEXTUAL DEFECT REPORT

LAB:INCHVT SDG: MFGD95

RUN	SAMPLE WITH DEF	ANALYTE	METHOD	REPORTED DATA	EXPECTED DATA	CHECKSUM	DEFECT CODE	SAMPLES CODED	ANALYSIS DATE	TIME
	S0	7439-97-6	CV				MD1	MFGD95	04/17/96	12:13
	S0	7439-97-6	CV				MD1	MFGD96	04/17/96	12:13

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
HOUSTON BRANCH
10625 FALLSTONE ROAD
HOUSTON, TEXAS 77099

RESUBMITTED DATA REVIEW REPORT

DATE: May 21, 1996 CASE #: 24517

SAS #:

TO: B. Canellas (6SF-RA) SDG #: FER94

LAB : AATSLA

FROM: Chris Covington - ESAT SITE : OLD BRAZOS FORGE

Region 6 PAGE: 1 of 1

ESAT#: O-1685 TDF#: 6-6246A

EFFECTS OF RESUBMITTED INFORMATION ON THE ORIGINAL DATA:

Laboratory response to CCS request (received 5/20/96):

Pest/PCB

1. The original data assessment remains unchanged.

2. The laboratory submitted a corrected Form 7E. Please replace page 693 in the original data package.

Laboratory Response to Results of CCS

Criterion	Comments
	PEST
PC.11	Section 9.2.4.5 states that "The calibration factors for the surrogates are
	calculated from the three analyses of Individual Standard Mixture A only."
	The percent RSD for surrogates in the "A" analyses meets criteria.
	Please remove this defect.
PD.5.2	Enclosed is corrected page 000693 and a corrected Agency Standard Disk.

000693
Corrected
ns 5/17/96

7E

PESTICIDE CALIBRATION VERIFICATION SUMMARY

Lab Name: AATSLA Contract: 68-D5-0023

Lab Code: AATSLA Case No.: 24517_ SAS No.: SDG No.: FER94

GC Column: DB-1701 ID: 0.53(mm) Init. Calib. Date(s): 04/23/96 04/24/96

EPA Sample No. (PIBLK): PIBLKF2 Date Analyzed : 04/24/96

Lab Sample ID (PIBLK): EPA1-7-AF2 Time Analyzed : 1725

EPA Sample No. (INDA): INDAMF2 Date Analyzed : 04/24/96

Lab Sample ID (INDA): EPA1-12-AF2 Time Analyzed : 1842

INDIVIDUAL MIX A COMPOUND	RT	RT WINDOW FROM	RT WINDOW TO	CALC AMOUNT (ng)	NOM AMOUNT (ng)	%D
alpha-BHC	6.32	6.27	6.37	0.0408	0.0400	2.0
gamma-BHC (Lindane)	7.14	7.08	7.18	0.0409	0.0400	2.2
Heptachlor	7.62	7.56	7.66	0.0411	0.0400	2.8
Endosulfan I	11.44	11.37	11.51	0.0427	0.0400	6.8
Dieldrin	13.18	13.10	13.24	0.0826	0.0800	3.2
Endrin	14.31	14.22	14.36	0.0841	0.0800	5.1
4,4'-DDD	17.47	17.39	17.53	0.0828	0.0800	3.5
4,4'-DDT	18.92	18.82	18.96	0.0855	0.0800	6.9
Methoxychlor	24.74	24.66	24.80	0.418	0.400	4.5
Tetrachloro-m-xylene	4.51	4.46	4.56	0.0403	0.0400	0.8
Decachlorobiphenyl	29.68	29.57	29.77	0.0844	0.0800	5.5

EPA Sample No. (INDB): INDBMF2 Date Analyzed : 04/24/96

Lab Sample ID (INDB): EPA1-16-AF2 Time Analyzed : 1958

INDIVIDUAL MIX B COMPOUND	RT	RT WINDOW FROM	RT WINDOW TO	CALC AMOUNT (ng)	NOM AMOUNT (ng)	%D
beta-BHC	8.88	8.84	8.94	0.0427	0.0400	6.8
delta-BHC	9.68	9.63	9.73	0.0439	0.0400	9.8
Aldrin	8.28	8.24	8.34	0.0428	0.0400	7.0
Heptachlor epoxide	10.34	10.28	10.42	0.0430	0.0400	7.5
4,4'-DDE	12.38	12.32	12.46	0.0854	0.0800	6.8
Endosulfan II	17.66	17.60	17.74	0.0886	0.0800	10.8
Endosulfan sulfate	24.19	24.13	24.27	0.0875	0.0800	9.4
Endrin ketone	26.23	26.17	26.31	0.0898	0.0800	12.2
Endrin aldehyde	21.43	21.37	21.51	0.0759	0.0800	-5.1
alpha-Chlordane	11.89	11.83	11.97	0.0435	0.0400	8.8
gamma-Chlordane	11.64	11.58	11.72	0.0435	0.0400	8.8
Tetrachloro-m-xylene	4.49	4.46	4.56	0.0401	0.0400	0.2
Decachlorobiphenyl	29.66	29.57	29.77	0.0796	0.0800	-0.5